

Summary of SGC Mayflower Mill and Tails Area Work Plan

The objective of the Work Plan is to investigate conditions at the Mayflower Mill and Tailing area ("Area") to determine the Area's contribution, if any, to impaired water quality in the Animas River. The steps are as follows:

- SGC will collect and summarize known information on historical uses and disposal practices in the Area.
- SGC will develop information on the properties of the tailings and other onsite sources. This will be accomplished by:
 - Collecting and analyzing existing data concerning the properties of the tailings and onsite sources.
 - Drilling, with sonic core methods, the tails material to determine geochemistry, hydraulic and geotechnical properties of the tails.
 - Investigating potential run-on of water to the tails and runoff from the tails.
 - Collecting synoptic surface water samples, including conductivity, total and dissolved metals, TDS, pH and temperature, from the Animas River at appropriate intervals, including replication, to the extent possible, of the 2002 -2003 USGS work and 2012 -2014 EPA work, as well as additional points to be determined. This sampling will be accomplished during early May, to characterize the rising limb of the hydrograph and in late fall to characterize the low flow condition.
- SGC will characterize groundwater flux and discharge from the tails to the Animas.
 - Based upon the results of the above work, boreholes will be installed, or other methods will be employed, as necessary to characterize targeted groundwater flows to the river.
- SGC will evaluate the cap material and develop cross sections of the tails impoundments.
 - This work will be accomplished using existing pre and post tailing maps, existing geotechnical studies and the results of the core drilling described above.
- SGC will collect and summarize existing information concerning the location of the sludge from the Gladstone water treatment plant.
- SGC will investigate the performance of the reactive barrier southwest of TSF 4.

SGC will develop detailed schedule, sequence and locations for the above described work. This information, together with a section addressing roles and responsibilities and the review process, will be included in the Work Plan.